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**ATTORNEYS FOR PLAINTIFF
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

UNITED STATES OF AMERICA, Plaintiff, vs. WILLIAM KRISSTOFER WOLF, Defendant.	CR 15-49-BLG-SPW <u>UNITED STATES' EXPERT WITNESS DISCLOSURE</u>
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The United States of America, by and through its counsel Bryan R. Whittaker, Assistant United States Attorney for the District of Montana, and Danya E. Atiyeh, Trial Attorney, Counterterrorism Section, National Security Division, U.S. Department of Justice, provides the following expert witness disclosures to the Court and the defendant. This disclosure is identical to the information provided to defense in the FBI 302 of Mr. Holt during the initial production of discovery on April 27, 2015, Bates Numbers USAO-000025-26.

I. Ronnie S. Holt

Ronnie S. Holt is an Equipment Specialist (Gunsmith) with the Federal Bureau of Investigation (“FBI”), located in Quantico, Virginia. He specializes in building, modification, complete repair, maintenance, and use of a large variety of firearms. His additional duties include the design and manufacture of various weapons parts and specialty tools which were not or are not commercially available.

Mr. Holt has almost 30 years of gunsmithing experience to include a wide array of weapon systems. He began his training and experience during his service in the United States Marine Corps in 1984. He then received training from the Military Occupational Specialty School, Aberdeen Proving Ground, Aberdeen, MD. He received further training in the Weapons Training

Battalion, Quantico, VA. He has worked as a gunsmith for the FBI for the past 10 years.

At the request of the FBI Salt Lake City Field Division, Holt was prepared the Saiga 12 shotgun, serial number 01408040, for use in this case. Mr. Holt described the aforementioned Saiga 12 shotgun as a rotating bolt, gas operated, piston driven, magazine fed, air cooled, shoulder fired weapon capable of select fire in semi-automatic or fully automatic modes of fire.

Mr. Holt modified this shotgun to be capable of fully automatic fire by removing all rivets securing the external optics mount and the internal ejector block. The ejector block was modified for clearance of the auto sear and spring. Mr. Holt tapped the holes in the ejector block so it could be reinstalled securely as it is a structural part of the receiver. Next, he located the proper position of the auto sear and drilled the receiver for the auto sear pin. The trigger assembly was relocated to the standard position for an AK style weapon and reattached the trigger guard. This modification also allows for the installation of a pistol grip. A new buttstock with integral pistol grip was installed.

Mr. Holt modified the right side bottom rail of the bolt carrier to trip the auto sear after the bolt had locked into battery position. This sets the timing of the weapon. The proper position of the selector lever in full auto fire was

established and a detent notch was cut in the right side of the receiver to retain the selector. Next, Mr. Holt cut the barrel to 16" and faced I squared the muzzle end of the barrel. All three gas ports were opened slightly for reliable functioning of the weapon. The weapon was then painted black and "baked" to cure the paint.

Mr. Holt assembled the weapon installing a full auto sear and sear spring, full auto hammer and full auto disconnect and lightly lubricated the weapon. He test fired approximately 125 rounds in semi-automatic and fully automatic modes of fire using two, ten round magazines. The weapon fired reliably in all modes of fire with no malfunctions. He cleaned and lubricated the weapon before shipment to the Salt Lake City Field Division.

Mr. Holt will testify that the legal definition of a firearm is defined in 18 U.S.C. § 921(a) (3): The term "firearm" means (A) any weapon (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive: (B) the frame or receiver of any such weapon; (C) any firearm muffler or firearm silencer; or (D) any destructive device. Such terms does not include an antique firearm.

Based on the descriptions outlined above, Mr. Holt concluded that the Saiga12 shotgun referenced in this document meets the legal definition of a firearm.

Mr. Hold also will testify that the legal definition of a short barreled shotgun is defined in 18 U.S.C. § 921 (a) (6): The term “short-barreled shotgun” means a shotgun having one or more barrels less than eighteen inches in length and any weapon made from a shotgun (whether by alteration, modification, or otherwise) if such weapon as modified has an overall length of less than twenty-six inches.

Mr. Holt concluded that the Saiga 12 firearm referenced above meets the legal definition of a short barreled shotgun.

He will further testify that the legal definition of a machinegun is defined in 26 U.S.C. § 5845(b): The term “machinegun” means any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.

Mr. Holt concluded that the Saiga 12 firearm referenced above meets the legal definition of a machinegun.

A copy of Mr. Holt's 302, report, and curriculum vitae have been provided to the defendant. Mr. Holt may reference the following exhibits during his testimony:

1. The Saiga 12 firearm.

DATED this 19th day of October, 2015.

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